

EXHIBIT A

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF NEW JERSEY
3 CAMDEN VICINAGE

4 *****
5 IN RE: VALSARTAN, LOSARTAN, MDL No. 2875
6 AND IRBESARTAN PRODUCTS

7 LIABILITY LITIGATION Civil No.
8 19-2875

9 ***** (RBK/JS)

10 THIS DOCUMENT APPLIES TO ALL
11 CASES HON ROBERT B.
12 KUGLER

13 *****

14 - CONFIDENTIAL INFORMATION -
15 SUBJECT TO PROTECTIVE ORDER

16

17

18 Remote Videotaped via Zoom
19 Deposition of LIHONG (LINDA) LIN, commencing
20 at 7:07 a.m. China Standard Time, on the 4th
21 of May, 2021, before Maureen O'Connor
22 Pollard, Registered Diplomat Reporter,
23 Realtime Systems Administrator, Certified
24 Shorthand Reporter.

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1 invite Ting Zhou and Ying Xiong over.

2 Q. When did you first find out
3 that your deposition was going to be taken?

4 A. Well, one day in 2020.

5 Q. Which day?

6 A. I don't recall.

7 Q. Which month?

8 A. Which month? I believe it was
9 sometime in early 2020 -- no, first half of
10 2020, rather. It was either early 2020 or
11 mid-2020. I believe it was in April.
12 Actually, I'm not quite sure it was exactly
13 in April. I believe it was sometime in
14 mid-2020.

15 Q. Do you keep a calendar where
16 you could look at the calendar and see when
17 you first learned of this?

18 A. Sorry, I don't keep a calendar.
19 I didn't realize that it's so important to
20 Mr. Slater that -- the first time I heard of
21 this deposition. I just don't have a habit
22 to remember everything.

23 Q. Do you have any sort of a
24 calendar, for example, Outlook or something

1 electronic, that keeps track of your meetings
2 and your schedule, or do you just remember
3 everything?

4 A. It goes like this. For some
5 meetings, like the meeting today, someone
6 would send me the invite, and I would see
7 that invite in my e-mail.

8 In the course of my employment,
9 I would try to remember those meetings and
10 always try to remind me what I should do for
11 the next day.

12 In addition, sometimes my
13 colleagues would remind me of those meetings.

14 Q. Did you get an e-mail --
15 rephrase.

16 Have you received any e-mails
17 regarding this deposition?

18 A. What subject are you referring
19 to?

20 Q. Did you receive any e-mails
21 about this deposition?

22 MS. PRISELAC: I would
23 object -- I'm sorry, Dr. Shao.
24 I would object and just

1 would last for about three hours for each
2 meeting.

3 Q. Your preparation for this
4 deposition with lawyers involved five to six
5 meetings of three hours on the average each
6 time, is that your best recollection?

7 A. That's correct.

8 Q. Do you use a computer?

9 MS. PRISELAC: Objection.

10 Vague.

11 A. Of course.

12 BY MR. SLATER:

13 Q. What type of computer do you
14 use for work?

15 A. What do you mean by "what type
16 of computer"?

17 Q. Is it a laptop? Is it a
18 desktop? Does it have a manufacturer's name
19 on it?

20 A. Now I understand your question.
21 I use a Dell laptop.

22 Q. How long have you had that
23 laptop for use at work?

24 A. I started using this laptop

1 April 1st, 2019. I remember very clearly
2 because the date is April 1st.

3 Q. What computer were you using
4 for work before April 1, 2019?

5 A. It was Surface. Microsoft
6 Surface.

7 Q. Was that a laptop?

8 A. It can be called as a laptop.
9 It can also be called as a tablet.

10 Q. When did you first using the
11 Microsoft Surface?

12 A. Around 2014.

13 Q. Why did you switch from the
14 Microsoft Surface to the Dell laptop on
15 April 1, 2019?

16 A. Because at that time I had
17 trouble turning on Microsoft Surface.
18 Sometimes it would take me 15 minutes to
19 reboot the Microsoft Surface. I couldn't
20 stand it.

21 Q. Will ZHP have a record of you
22 switching to a new computer and the reason
23 why, do you know?

24 A. I don't know. I made a request

1 for a new computer, and I was given one.

2 Q. Was the data and documents on
3 the Microsoft Surface moved over to the Dell
4 laptop when you changed computers in
5 April 2019?

6 A. Basically, yes. I still keep
7 that Microsoft Surface now.

8 Q. Do you keep -- rephrase.

9 Do you use paper and have paper
10 records for your work in addition to what you
11 put on your computer?

12 A. I seldomly make paper-based
13 records. Basically I would just grab a piece
14 of paper, write down something, and throw it
15 away afterwards.

16 In terms of making
17 arrangements, since I am located very close
18 to my subordinates, it would be very quick
19 for me to make arrangements.

20 Q. How many subordinates do you
21 have?

22 A. I have many subordinates. They
23 would always come into the office and go out.

24 So I would like you to clarify,

1 what subjects are you referring to when you
2 mention "subordinates"?

3 Q. You mentioned your
4 subordinates, so I'm asking how many there
5 are.

6 A. If you're asking me for the
7 total number of subordinates, I will give it
8 a try to count them. Approximately, there
9 are around 50 or 55.

10 Q. Do you consider people who work
11 at Huahai US, Princeton, or Solco to be your
12 subordinates?

13 A. No. I only count my
14 subordinates working in the company
15 headquarters.

16 Q. Was your Dell laptop and your
17 Microsoft Surface tablet collected so that
18 the information and data could be provided to
19 us as part of this litigation, to your
20 knowledge?

21 A. That's correct. That is why I
22 always keep this Microsoft Surface.

23 Q. You kept the Microsoft Surface
24 so it could be collected and the data could